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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JOE PERVOE, individually and as successor in
interest to John Wayne McGee, and CAROLYN
COPELAND, individually,

Plaintiff,
v.

RYAN SWETAVAGE, an individual; MIGUEL
IBARRA, an individual; LONALA
KAHO'ALI'I, an individual; ANDREA
NEDEROSTEK, an individual; TRAVIS
HIGGINS, an individual; DEREK MEZA, an
individual; CHRISTOPHER HAENDEL, an
individual; ALBERTO-ANDRES HOLMES, an
individual; JOHN TOWNSLEY, an individual;
THOMAS NELSON, an individual; and DOES
1-50, inclusive, in their capacities as Sheriff's
Deputies for the COUNTY OF ALAMEDA,

Defendants.

CASE NO.: 4:12-cv-04286 JST

**STIPULATION REGARDING MOTION TO
COMPEL DEADLINE; ~~PROPOSED~~
ORDER**

STIPULATION

WHEREAS, the parties have proceeded with conducting discovery in the instant action;

WHEREAS, the parties previously submitted to the Court a Stipulation Regarding ADR, Expert Witness Designations, and Fact Discovery on February 2, 2015, to extend the completion of fact discovery;

WHEREAS, the Court ordered the close of fact discovery extended to March 5, 2015, such that Plaintiffs' should respond to Defendants' contention interrogatories by the close of fact discovery;

WHEREAS, the parties have met and conferred regarding Plaintiffs' discovery responses and Plaintiffs' agreed to supplement their responses, including contention interrogatories responses;

WHEREAS, Plaintiffs' failed to provide supplemental responses to Defendants' contention interrogatories and other fact discovery by March 5, 2015;

WHEREAS, pursuant to Civil L.R. 37-3 Defendants' deadline to file a motion to compel further responses to their discovery requests is March 12, 2015;

WHEREAS, Plaintiffs' counsel has assured Defendants' counsel that Plaintiffs' supplemental discovery responses will be served on March 11, 2015;

WHEREFORE, the parties respectfully request that the Court's scheduling order in this action be modified to allow the Plaintiffs' time to serve supplemental discovery responses and so that Defendants may have sufficient time to review the responses prior to expiration of the motion to compel deadline, by:

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